

1                                   **IN THE UNITED STATES DISTRICT COURT**  
2                                   **FOR THE SOUTHERN DISTRICT OF GEORGIA**  
3                                   **AUGUSTA DIVISION**

4       **GARY JONES,**

5                                   Plaintiffs,

6                                   **vs.**

7       **CITY OF WAYNESBORO, ALBERTA**

8       **J. ANDERSON, RICHARD H. BYNE,**

9       **JAMES JONES, VICKEY BATES, BILL**

10      **TINLEY, WILLIE WILLIAMS,**

11      **VALERIE KIRKLAND, and WILLIE J.**

12      **BURLEY,**

13                                   Defendants.

**Case No.: 1:22-cv-00030-JRH-BKE**

14                                   **STIPULATION OF DISMISSAL AS TO ALL DEFENDANTS EXCEPT CITY OF**  
15                                   **WAYNESBORO AND REQUEST FOR DISMISSAL OF COUNT 2**

16                                   **COMES NOW** Plaintiff Gary Jones and Defendants City of Waynesboro, Alberta J.  
17       Anderson, Richard H. Byne, James Jones, Vickey Bates, Bill Tinley, Willie Williams, Valerie  
18       Kirkland, and Willie J. Burley, by and through their undersigned counsel, and hereby stipulate  
19       and agree, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), that all claims in the above captioned action  
20       as to the following defendants, and only the following defendants, are dismissed WITH  
21       PREJUDICE, with all attorneys' fees, costs of court, and expenses to be borne by each party  
22       incurring the same:

- 23                                   • Alberta J. Anderson,
- 24                                   • Richard H. Byne,
- 25                                   • James Jones,
- 26                                   • Vickey Bates,
- 27                                   • Bill Tinley,
- 28                                   • Willie Williams,

- Valerie Kirkland, and
- Willie J. Burley.

As for the claims pending against the remaining defendant, City of Waynesboro, the parties further, through their undersigned counsel, hereby move the Court for an order dismissing Count 2 of Plaintiff's complaint.

For the convenience of the Court, the Parties have attached a proposed order.

Respectfully submitted,

Dated: November 7, 2022

**HUGGINS PEIL, LLC**

/s/ Jeffrey F. Peil

Jeffrey F. Peil (SBN 967902)

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*Attorney for Plaintiff*

Signed:

**DOUGLAS H. DUERR**

By: s/ Douglas H. Duerr

*Attorney for Defendant City of Waynesboro*

Signed:

**DANIEL BARRETT**

By: s/ Daniel Barrett

*Attorney for Defendant City of Waynesboro*

Signed:

**RANDOLPH FRAILS**

By: s/ Randolph Frails

*Attorney for Defendant City of Waynesboro*

Signed:

**DELIA DEBLASS**

By: s/ Delia DeBlass

*Attorney for Defendant City of Waynesboro*

Signed:

**PATRICIA T. PAUL**

By: s/ Patricia T. Paul

*Attorney for Defendants Anderson, Byne, Jones, Bates, Tinley, Williams, Kirkland, and Burley*

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Signed: **PATRICK T. O’CONNOR**

By: s/ Patrick T. O’Connor  
*Attorney for Defendants Anderson, Byne, Jones,  
Bates, Tinley, Williams, Kirkland, and Burley*

**SIGNATURE CERTIFICATION**

I hereby certify **Douglas H. Duerr, Daniel Barrett, Randolph Frails, Delia DeBlass, Patricia T. Paul, and Patrick T. O'Connor**, counsels for Defendants, concur in the content of this filing and have authorized me to sign their names to this filing.

By: s/ Jeffrey F. Peil

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all attorneys of record.

Dated: November 7, 2022

**HUGGINS PEIL, LLC**

/s/ Jeffrey F. Peil

Jeffrey F. Peil

*Attorney for Plaintiff*

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